

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

JESSICA DE LA ROSA, JEAN RYAN,
BRONX INDEPENDENT LIVING
SERVICES, BROOKLYN CENTER FOR
INDEPENDENCE OF THE DISABLED,
CENTER FOR INDEPENDENCE OF THE
DISABLED, NEW YORK, DISABLED IN
ACTION OF METROPOLITAN NEW YORK,
HARLEM INDEPENDENT LIVING
CENTER, on behalf of themselves and all
others similarly situated,

Plaintiffs,
-against-

METROPOLITAN TRANSPORTATION
AUTHORITY, JANNO LIEBER, in his official
capacity as chair and chief executive officer of
the Metropolitan Transportation Authority,
NEW YORK CITY TRANSIT AUTHORITY,
RICHARD DAVEY, in his official capacity as
President of the New York City Transit
Authority, and the CITY OF NEW YORK,

Defendants.

No. 19-cv-4406 (ER)

**NOTICE OF MOTION FOR
FINAL APPROVAL OF
CLASS SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiffs will and hereby do move this Court for an
order granting final approval of the proposed Settlement Agreement.

This Motion is based upon this Notice; the accompanying Memorandum of Law; the
declaration of Chloe Holzman; all pleadings and other documents on file in this action; all
matters of which the Court may or must take judicial notice, and any argument or evidence that
may be presented at the Fairness Hearing in this matter.

Dated: March 17, 2023
Brooklyn, New York

Respectfully submitted,

DISABILITY RIGHTS ADVOCATES

s/ Chloe Holzman

Chloe Holzman
Rebecca Rodgers
Torie Atkinson
655 Third Avenue, 14th Floor
New York, NY 10017
Tel: (212) 644-8644
Fax: (212) 644-8636
cholzman@dralegal.org
rrodgers@dralegal.org
tatkinson@dralegal.org

SHEPPARD, MULLIN, RICHTER &
HAMPTON, LLP

s/ Daniel L. Brown

Daniel L. Brown
30 Rockefeller Plaza, 39th Floor
New York, NY 10112
Tel: (212) 634-3095
Fax: (212) 653-8701
dlbrown@sheppardmullin.com

Attorneys for Plaintiffs

Jelena Kolic
300 South Wacker Drive, Floor 32
Chicago, IL 60603
Tel: (312) 559-4660 Ext. 7560
Fax: (212) 644 8636
jkolic@dralegal.org

Stuart Seaborn
2001 Center Street, 4th Floor
Berkeley, CA 94704
Tel: (510) 665-8644
Fax: (510) 665-8511
sseaborn@dralegal.org

Attorneys for Plaintiffs